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DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 09/23/2022

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September 22, 2022

Hon. Valerie E. Caproni  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: United States v. Fabio Younes Arboleda and Armando Gomez  
18 Cr 262 (VEC)

Hon. Valerie Caproni:

I am counsel for Fabio Simon Younes Arboleda, who is scheduled to be sentenced on October 13, 2022. Because there is an issue regarding whether Mr. Younes' guilty plea was knowingly and voluntarily entered, I respectfully request that Your Honor appoint counsel pursuant to the Criminal Justice Act to determine whether any further motion practice is necessary with respect to his guilty plea.

By no later than **September 28, 2022**, Defense counsel must provide the court, *in camera*, with the basis for the suggestion that Mr. Younes's plea may not have been entered knowingly and voluntarily.

Sincerely,

/s/

Donald J. Yannella, Esq.

SO ORDERED.

 09/23/2022

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE